

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

\*\*\*\*\*

Dominic Ali, \*

Plaintiff \*

v. \*

12-cv-00364-SM

Warden Edward Reilly, Chaplain Dana Hoyt, \*

Scott Watson, John Masse, Shanon Berwick \*

Defendants \*

\*\*\*\*\*

**ADDENDUM TO STATE DEFENDANTS' CROSS-MOTION**  
**FOR SUMMARY JUDGMENT**

NOW COME Warden Edward Reilly, Chaplain Dana Hoyt, Lts. John Masse and Shanon Berwick, and Corrections Officer Scott Watson (together the "State Defendants") by and through their counsel, the Office of the Attorney General, and submit this Addendum to State Defendants' Cross-Motion for Summary Judgment:

1. On August 22, 2013, the State Defendants filed its Cross-Motion for Summary Judgment (ECF Doc. 20) with accompanying documents, including a memorandum of law, 8 affidavits and additional exhibits.

2. Attachment 22 to ECF Document 20 is the Affidavit of Warden Edward Reilly and attachment 23 is the Affidavit of Nancy Walcott. Each affidavit referenced an exhibit that was to be included with their respective affidavits, but was inadvertently omitted when filed.

3. The State Defendants therefore submit this Addendum to Defendants' Cross-motion for Summary Judgment, which consists of Exhibit G-1, a seven page attachment to Exhibit G (Affidavit of Edward Reilly) and Exhibit H-1 a 30-page attachment to Exhibit H (Affidavit of Nancy Wolcott).

WHEREFORE, it is respectfully requested that this Honorable Court:

- A. Append the attached Exhibit G-1 to Warden Reilly's Affidavit found at Attachment 22;
- B. Append the attached Exhibit H-1 to Nancy Wolcott's Affidavit found at Attachment 23; and
- C. Grant any additional relief that is just and equitable.

Respectfully submitted,

By their attorneys,

JOSEPH A. FOSTER  
Attorney General

Date: August 22, 2013

/s/ Francis C. Fredericks  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was mailed this 22nd day of August 2013, postage prepaid, to:

Dominic S. Ali, # 81829  
Northern NH Correctional Facility  
138 E Milan Rd.  
Berlin, NH 03570

/s/ Francis C. Fredericks  
Francis C. Fredericks